

REMARKS

Claims 1-22 remain pending in the application.

Claims 1, 3, 7, 9 and 10 over Cromer

In the Office Action, claims 1, 3, 7, 9 and 10 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Cromer et al., U.S. Patent No. 6,286,102 (“Cromer”), with claims 2 and 8 rejected as allegedly obvious under 35 U.S.C. §103(a). The Applicants respectfully traverse the rejection.

Claims 1-3, 7-9 and 10 recite, *inter alia*, a wireless piconet front end.

Cromer appears to teach a security system for computers that defines a control zone using particular frequency (Abstract). The zone may be established at a door exit or other secured area (Cromer, Abstract). The frequency triggers a device in a computer to send a serial number signal (Cromer, col. 13, lines 54-64). An emergency signal is triggered if a match is not identified in a database if the serial number signal and an authorized list of serial numbers (Cromer, col. 14, lines 1-6).

Cromer teaches a wireless security system having a transmitter and receiver. However, Cromer fails to even mention utilizing a wireless piconet front end, as claimed by claims 1-3, 7-9 and 10.

A benefit of utilizing a piconet front end is, e.g., possible use of an existing networking device. The popular piconet standard, i.e., BLUETOOTH, is potentially being implemented in numerous devices including telephones, watches, remote controls, etc. Such devices would already containing piconet transceivers. The pre-existence of piconet devices results in a tremendous cost savings over the prior arts' implementations that require originally designed systems to perform similar functions.

Accordingly, for at least all the above reasons, claims 1-3, 7-9 and 10 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 4, 11-14 and 17-20 over Cromer in view of Wynn

In the Office Action, claims 4, 11-14 and 17-20 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Cromer in view of Wynn et al., U.S. Patent No. 5,717,867 ("Wynn"). The Applicants respectfully traverse the rejection.

Claim 4 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 4 recites, *inter alia*, a wireless piconet front end.

As discussed above, Cromer fails to teach utilizing a wireless piconet front end, as claimed by claim 4.

The Office Action relies on Wynn to allegedly make up for the deficiencies in Cromer to arrive at the claimed invention. The Applicants respectfully disagree.

Wynn appears to teach a time entry and accounting system permitting employees to clock in and out from work (Abstract). A computerized time clock is located adjacent to workstations and used using with an individually encoded identification card (Wynn, Abstract). The time clocks record clock in and clock out times for multiple employees, transmitting this information to other components of a time and attendance system (Wynn, col. 6, lines 15-26). RF time clocks communicate with the rest of the time and attendance system (Wynn, col. 6, lines 28-45).

Wynn teaches a wireless time and attendance system. However, Wynn fails to teach a wireless piconet front end, as claimed by claim 4.

Neither Cromer nor Wynn, either alone or in combination, disclose, teach or suggest a wireless piconet front end, as claimed by claim 4.

Claims 11-14 and 17-20 recite, *inter alia*, establishing a wireless network between a personal wireless piconet identifying device associated with a particular monitored person and an access monitoring base unit.

As discussed above, Cromer fails to teach a piconet device, as claimed by claims 11-14 and 17-20.

Wynn teaches a wireless time entry and accounting system. However, Wynn fails to teach a piconet identifying device, as claimed by claims 11-14 and 17-20.

Neither Cromer nor Wynn, either alone or in combination, disclose, teach or suggest establishing a wireless network between a personal wireless piconet identifying device associated with a particular monitored person and an access monitoring base unit, as claimed by claims 11-14 and 17-20.

At best even if Cromer and Wynn were combinable (which they are not), the theoretical combination teaches away from the Applicants' invention by simply teaching scanning a badge (per Wynn) when passing through a checkpoint (per Cromer). Applicants utilize a piconet identifying device utilizing a piconet front end. A piconet device automatically establishes a communications network with other piconet devices once within a communication range with the other piconet devices, an advantage not taught or suggested by the cited prior art.

Accordingly, for at least all the above reasons, claims 4, 11-14 and 17-20 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 5 and 6 over Cromer in view of Nerlikar

In the Office Action, claims 5 and 6 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Cromer in view of Nerlikar, U.S. Patent No. 5,629,981 ("Nerlikar"). The Applicants respectfully traverse the rejection.

Claims 5 and 6 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 5 and 6 recite, *inter alia*, a wireless piconet front end.

As discussed above, Cromer fails to teach utilizing a wireless piconet front end, as claimed by claims 5 and 6.

The Office Action relies on Nerlikar to allegedly make up for the deficiencies in Cromer to arrive at the claimed invention. The Applicants respectfully disagree.

Nerlikar appears to teach a networked information management and security system (Abstract). An RF reader transceiver automatically identifies and verifies authorization of a transponder badge holder via a handshake prior to allowing access to a host peripheral (Nerlikar, Abstract). The RF reader may be associated via a network server with a LAN, WAN or MAN (Nerlikar, col. 14, lines 17-31).

Nerlikar teaches a security system connected to a LAN, WAN or MAN. However, Nerlikar fails to teach a wireless piconet front end, as claimed by claims 5 and 6.

Neither Cromer nor Nerlikar, either alone or in combination, disclose, teach or suggest a wireless piconet front end, as claimed by claims 5 and 6.

Nerlikar badge is similar to Wynn's badge, as discussed above. Applicants utilize a piconet identifying device utilizing a piconet front end. A piconet device automatically established a communications network with other piconet devices once within a communication range with the other piconet devices, an advantage not taught or suggested by either Cromer nor Nerlikar.

Accordingly, for at least all the above reasons, claims 5 and 6 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 15, 16, 21 and 22 over Cromer in view of Wynn and Weller

In the Office Action, claims 15, 16, 21 and 22 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Cromer in view of Wynn, and further in view of Weller, U.S. Patent No. 5,448,221 ("Weller"). The Applicants respectfully traverse the rejection.

Claims 15, 16, 21 and 22 are dependent on claims 11 and 17 respectively, and are allowable for at least the same reasons as claims 11 and 17.

Claims 15, 16, 21 and 22 recite, *inter alia*, establishing a wireless network between a personal wireless piconet identifying device associated with a particular monitored person and an access monitoring base unit.

As discussed above, neither Cromer nor Wynn, either alone or in combination, disclose, teach or suggest establishing a wireless network between a personal wireless piconet identifying device associated with a particular monitored person and an access monitoring base unit, as claimed by claims 15, 16, 21 and 22.

The Office Action relies on Weller to allegedly make up for the deficiencies in Cromer and Wynn to arrive at the claimed invention. The Applicants respectfully disagree.

Weller appears to teach a monitoring system that determines the presence of a person or persons to be monitored within a well-defined area (Abstract) A portable remote device is in two-way communication with a base unit (Weller, Abstract). The base unit is in communication with a telephone line to enable communication with a monitoring service (Weller, col. 3, lines 15-23).

Weller teaches a wireless monitoring system that sends an alarm signal to a monitoring service. However, Weller fails to teach a personal wireless piconet identifying device, as claimed by claim 15, 16, 21 and 22.

Neither Cromer, Wynn nor Weller, either alone or in combination, disclose, teach or suggest establishing a wireless network, much less a wireless network between a personal wireless piconet identifying device associated with a particular monitored person and an access monitoring base unit, as claimed by claim 15, 16, 21 and 22.

Accordingly, for at least all the above reasons, claims 15, 16, 21 and 22 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



William H. Bollman
Reg. No. 36,457

Manelli Denison & Selter PLLC
2000 M Street, NW
Suite 700
Washington, DC 20036-3307
TEL. (202) 261-1020
FAX. (202) 887-0336

WHB/df